

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

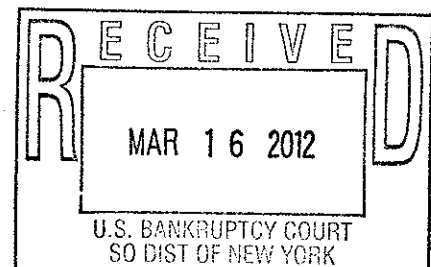
In re:	)	
	)	
MOTORS LIQUIDATION COMPANY, et al.,	)	Chapter 11 Case No.
f/k/a General Motors Corp., et al.	)	09-50026 (REG)
	)	
Debtor.	)	(Jointly Administered)

**MOTION OF CREDITORS JOSEPH P. BALANO AND MICHELLE BALANO TO  
VACATE DISSALLOWANCE AND EXPUNGEMENT OF CLAIM**

COME NOW, Creditors Joseph P. Balano and Michelle Balano, and move this court for a reconsideration of the Order Granting the 267<sup>th</sup> Omnibus Objection to Claims in regard to Joseph P. Balano and Michelle Balano. This Motion is made pursuant to 11 U.S.C. § 502(j) and Fed.R.Bankr.P. 3008.

In support thereof, Creditor states as follows:

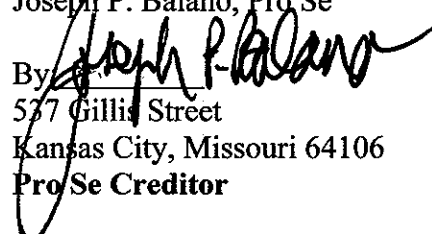
1. The Notice of 267<sup>th</sup> Omnibus Objection to Claims, dated January 27, 2012, was sent to the claimants Balanos' former address at 4933 SW Gulf Point, Lee's Summit, Missouri.
2. The claimants Balanos did not timely receive this Notice.
3. The Order Granting the 267<sup>th</sup> Omnibus Objection to Claims, dated March 5, 2012, was sent to claimants Balanos' current address at 537 Gillis St., Kansas City, Missouri.
4. The claimants Balanos would ask that the Order Granting the 267<sup>th</sup> Omnibus Objection to Claims be vacated in regard to their claim and that they be given further time to file supporting documentation of their claim.
5. That the Motion to Vacate is being filed within ten (10) days of the Entry of the Court Order.



6. That Joseph P. Balano is still under treatment for the injuries he sustained in an accident in a General Motors vehicle where the air bag did not deploy.
7. That attorneys in Springfield, Missouri that represent General Motors are aware of the Balanos' claim, Mr. Balano's medical condition, his ongoing medical treatment and his disability.
8. This Motion should also be allowed under 11 U.S.C. 105 in fairness and justice, and in order to properly carry out the bankruptcy provisions.
9. Granting this Motion will not unduly prejudice the Debtor.

Respectfully submitted,

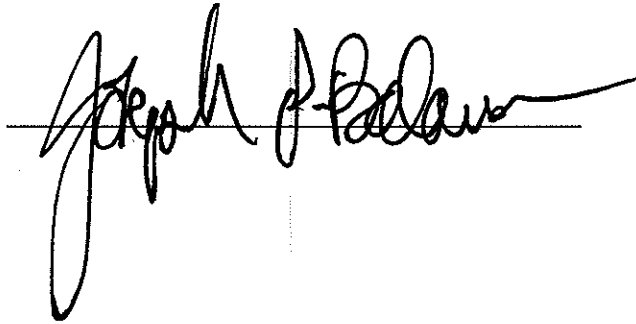
Joseph P. Balano, Pro Se

By   
537 Gillis Street  
Kansas City, Missouri 64106  
**Pro Se Creditor**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 15<sup>th</sup> day of March, 2012 a copy of the foregoing was sent, via US Mail, to the following:

DICKSTEIN SHAPIRO LLP  
Stefanie Birbrower Greer  
1633 Broadway  
New York, New York 10019-6708  
**Attorneys for Motors Liquidation  
Company GUC Trust**

A handwritten signature in black ink, appearing to read "Joseph P. Balaw", is written over a horizontal line. The signature is fluid and cursive.